



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 12, 2021

3/16/2021

By E-Mail

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

The pending motion deadlines are adjourned 60
days. The time is extended

proposed

Paul Mollo
USA

Re: *United States v. Haji Abdul Satar Abdul Manaf, 18 Cr. 762 (PAC)*

Dear Judge Crotty:

Based upon the parties' discussions following the defendant's recent change of counsel, the parties respectfully request that the pending motions deadlines in this matter be adjourned for approximately 60 days. The defendant's pretrial motions are currently due on April 9, 2021, and the Government's anticipated motion pursuant to the Classified Information Procedures Act is currently due on May 7, 2021. The requested adjournment would provide the parties an opportunity to engage in discussions regarding the potential for a disposition in this matter, and permit the defendant additional time to review discovery and consult with newly re-appointed counsel. The parties jointly request that the defendant's time for pretrial motions be extended accordingly until approximately June 9, 2021, with time for opposition and reply to follow, and that the Government's CIPA deadline be extended until approximately July 9, 2021.

In light of this joint request, the Government also moves for the exclusion of time under the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), until approximately July 9, 2021, in order to afford the defendant time to review discovery, consult with counsel, and to engage in discussions regarding the potential for a pretrial disposition. The defense consents to this application.

Respectfully submitted,
AUDREY STRAUSS
United States Attorney

By: /s/
Jessica Fender
Kimberly Ravener
Assistant United States Attorneys
(212) 637-2276/2358

cc: Sabrina Shroff, Esq.